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Attorneys for Defendant
Virgin America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – E-FILING

JENNIFER KEUM,

Plaintiff,

vs.

VIRGIN AMERICA, INC., and DOES 1
through 25, inclusive,

Defendants.

CASE NO.: 3:10-CV-03285 SI

Case Management Conference

Date: March 25, 2011

Time: 2:30 p.m.

Courtroom: 10

**PARTY'S STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED by and between defendant VIRGIN AMERICA, INC. and plaintiff JENNIFER KEUM as follows:

1. To request that the court continue the case management conference in this matter to April 8, 2011.

Pursuant to Local Rule 6-2(a) the parties provide the following information:

1. This request is being made because counsel for Virgin America, Ms. Winter, has a conflict requiring her to be out of town on another matter on March 25, 2011, the date on which the court set the case management conference. Stephen Nelson, the other attorney of record for defendant, will be out of the country on March 25, 2011.

2. Ms. Winter and Mr. Nelson are the logical persons to attend the case management conference to answer any questions that the court may have, as they are the only attorneys in this office who are intimately familiar with this matter, having dealt with the matter since its inception.

1 In fairness to Virgin America and to the court, substitution of counsel who has not worked on this
2 matter would waste the court's time and prejudice Virgin America.

3 3. The court has ordered one previous time modification in the matter following the
4 parties' stipulation to continue the hearing on defendant's motion for judgment on the pleadings
5 filed on January 20, 2011.

6 4. A delay of two weeks will not have any effect on the overall timing or deadlines in
7 this case.

8
9 DATED: March 16, 2011

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

11 By: /s/ Kristin A. Winter

12 Stephen L. Nelson

Kristin A. Winter

13 Attorneys for Defendant

Virgin America, Inc.

14
15 DATED: March 17, 2011

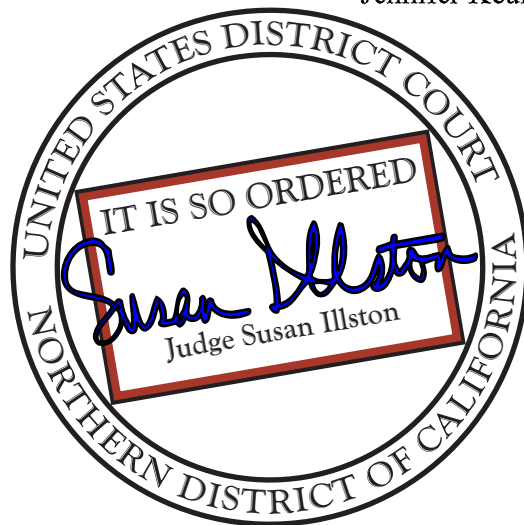
LAW OFFICES OF DANIEL VEGA

17 By: /s/ Daniel Martinez de la Vega

18 Daniel Martinez de la Vega

19 Attorneys for Plaintiff

Jennifer Keum



CERTIFICATE OF SERVICE*Jennifer Keum v. Virgin America, Inc., et al.*

I am over the age of eighteen years and am not a party to the within cause. I am employed in the City and County of San Francisco, California and my business address is 525 Market Street, 17th Floor, San Francisco, California 94105. On this date I served the following document(s).

STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE

on the parties identified below, through their attorneys of record, by placing true copies thereof in sealed envelopes addressed as shown below by the following means of service:

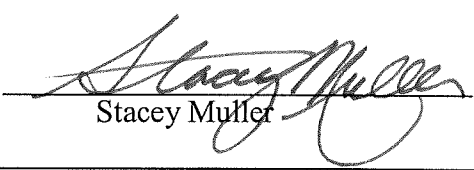
- ☐: **By United States Mail.** I placed the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- ☐: **By Overnight Delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and address to the persons at the addresses below. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
- ☐: **By Messenger Service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed below and provided them to a professional messenger service for service.
- ☐: **By Fax Transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which was printed out, is attached.
- ☒: **By Electronic Service.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

Daniel Martinez de la Vega
Law Offices of Daniel Vega
201 Spear Street, Suite 1100
San Francisco, CA 94105
Tel: (415) 287-6203
Fax: (415) 704-5067

Attorneys for Plaintiff
JENNIFER KEUM

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

EXECUTED March 17, 2011, at San Francisco, California.


Stacey Muller